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ORACLE AMERICA, INC.

20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 ORACLE AMERICA, INC.

24 Plaintiff,

25 v.

26 GOOGLE INC.

27 Defendant.

Case No. CV 10-03561 WHA

**ORACLE'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Dept.: Courtroom 8, 19th Floor  
Judge: Honorable William H. Alsup

Pursuant to Civil Local Rules 7-11 and 79-5, plaintiff Oracle America, Inc. ("Oracle") hereby moves to file under seal portions of Oracle's Motion to Disqualify the Rule 706 Expert ("Motion to Disqualify") and the entirety of Exhibit 5 to the Declaration of Peter A. Bicks in Support of Oracle's Motion to Disqualify the Rule 706 Expert ("Bicks Declaration").

The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this case, ECF No. 68, states that when material has been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY," a party may not file it in the public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated Protective Order § 14.4, ECF No. 66.

Apple Inc. and Samsung Electronics Co., Ltd. have designated certain documents summarized, quoted, or reproduced in Oracle's Motion to Disqualify and Exhibit 5 to the Bicks Declaration as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" pursuant to the Protective Order. *See also* ECF 1324; ECF 1328. Therefore, pursuant to the Protective Order, Oracle moves to seal those portions of Oracle's Motion to Disqualify that summarize, quote from, or reproduce those documents, as well as the entirety of Exhibit 5 to the Bicks Declaration.

Oracle states no position as to whether disclosure of these materials would cause harm to Apple Inc., Samsung Electronics Co., Ltd., or any other party.

Dated: October 15, 2015

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